

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	
<b>Jesus Jose Palmeroni AKA Joseph Palmeroni, DBA JJP Consulting, LLC</b>	:	<b>Case No.: 5:16-bk-03073-JJT</b>
	:	<b>Chapter 13</b>
	:	<b>Judge John J. Thomas</b>
	:	*****
<b>Debtor(s).</b>	:	
	:	
<b>U.S. Bank National Association, as Trustee for Citigroup Mortgage Loan Trust 2006-WFHE3, Asset-Backed Pass- Through Certificates, Series 2006- WFHE3</b>	:	
<b>Movant</b>	:	

v.

**Jesus Jose Palmeroni AKA Joseph  
Palmeroni, DBA JJP Consulting, LLC**

**Respondent**

**PRAECIPE TO WITHDRAW CREDITOR'S OBJECTION  
TO DEBTOR'S CHAPTER 13 PLAN**

Kindly withdraw the Objection to Debtor's Chapter 13 Plan that was filed on September 23, 2016, on behalf of U.S. Bank National Association, as Trustee for Citigroup Mortgage Loan Trust 2006-WFHE3, Asset-Backed Pass-Through Certificates, Series 2006-WFHE3 ("Creditor") at Docket number 22.

Respectfully submitted,

\_\_\_\_\_  
/s/ Karina Velter  
Karina Velter, Esquire (94781)  
Kimberly A. Bonner (89705)  
Holly N. Wolf (322153)  
Manley Deas Kochalski LLC  
P.O. Box 165028

16-022344\_JDD1

Columbus, OH 43216-5028  
Telephone: 614-220-5611  
Fax: 614-627-8181  
Attorneys for Creditor  
The case attorney for this file is Karina  
Velter.  
Contact email is kvelter@manleydeas.com

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<b>Jesus Jose Palmeroni AKA Joseph Palmeroni, DBA JJP Consulting, LLC</b>	:	<b>Case No.: 16-03073 Chapter 13 Judge John J. Thomas</b>
	:	<b>*****</b>
<b>Debtor(s).</b>	:	

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Praecipe to Withdraw  
Creditor's Objection to Debtor's Chapter 13 Plan was served on the parties listed below via  
e-mail notification:

United States Trustee, 228 Walnut Street, Suite 1190, Harrisburg, PA 17101

Charles J. DeHart III, Chapter 13 Trustee, 8125 Adams Drive, Suite A, Hummelstown, PA  
17036

Randall W. Turano, Attorney for Jesus Jose Palmeroni AKA Joseph Palmeroni, DBA JJP  
Consulting, LLC, 802 Monroe Street, Stroudsburg, PA 18360, rwtura@netscape.net

The below listed parties were served via regular U.S. Mail, postage prepaid, on October 24,  
2016:

Jesus Jose Palmeroni AKA Joseph Palmeroni, DBA JJP Consulting, LLC, 3308 Route 940,  
Suite 104, Mount Pocono, PA 18344

Jesus Jose Palmeroni AKA Joseph Palmeroni, DBA JJP Consulting, LLC, 1930 Route 715,  
Henryville, PA 18332

DATE: 10/24/16

/s/ Karina Velter

Karina Velter, Esquire (94781)  
Kimberly A. Bonner (89705)  
Holly N. Wolf (322153)  
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Attorneys for Creditor

The case attorney for this file is Karina  
Velter.

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